

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WILLIAM KOETSCH, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

ITT EDUCATIONAL SERVICES, INC.,
KEVIN M. MODANY, and DANIEL M.
FITZPATRICK,

Defendants.

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Case No.: 1:13-cv-01620-JPO

Case No.: 1:13-cv-02564-JPO

MASSACHUSETTS LABORERS' ANNUITY
FUND, Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

ITT EDUCATIONAL SERVICES, INC.,
KEVIN M. MODANY, and DANIEL M.
FITZPATRICK,

Defendants.

**NOTICE OF MOTION AND MOTION OF THE ITT INSTITUTIONAL INVESTOR
GROUP FOR APPOINTMENT AS LEAD PLAINTIFF, APPOINTMENT OF LEAD
COUNSEL, AND CONSOLIDATION OF RELATED ACTIONS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT Plumbers & Pipefitters National Pension Fund (“Plumbers National Pension Fund”) and Metropolitan Water Reclamation District Retirement Fund (the “Metropolitan Water Fund”) (collectively, the “ITT Institutional Investors Group” or “Movant”) respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), at 15 U.S.C. § 78u-4, for entry of an Order: (i) appointing Movant as Lead Plaintiff on behalf of itself and all others similarly situated who purchased ITT Educational Services, Inc. (“ITT” or the “Company”) common stock between April 24, 2008 and February 25, 2013, inclusive (the “Class Period”); (ii) appointing the law firm of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) to serve as Lead Counsel; and (iii) consolidating related actions.

This motion is supported by the accompanying Memorandum of Law, the Declaration of S. Douglas Bunch and the exhibits annexed thereto, all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Movant respectfully requests that the Court: (i) appoint the ITT Institutional Investor Group as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (ii) appoint Cohen Milstein as Lead Counsel for the Class; (iii) consolidate all related actions; and (iv) grant such other and further relief as the Court may deem just and proper.

Dated: May 10, 2013

Respectfully submitted,

COHEN MILSTEIN SELLERS
& TOLL PLLC

/s/ S. Douglas Bunch

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- and -

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***Additional Attorneys for the Plumbers &
Pipefitters National Pension Fund***